

ILLINOIS COMMERCE COMMISSION

DATA REQUEST

REQUEST NUMBER RWM-1.01 through RWM-1.07

Requested of Company Representative: Ms. Nancy Hertel/Ms. Theresa M. Bates

Utility Company: Ameritech Illinois

Date Submitted: May 29, 2001 Reference No.: 01-0338

Please provide the following documents and requested information on or before June 5, 2001, according to the following directions:

- A. Furnish all the information requested for each item in this data request. If that is not possible, please indicate what information is not being provided and the reason that it cannot be provided.
- B. The response to each data request item should begin on a new page. As part of your response, please identify the item to which you are responding by typing it at the top of the page. In addition, provide the name, job title and phone number of the person responsible for providing the information requested for each item.
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- D. Please provide individual responses as they become available. If you make reference to written testimony filed by your company's witnesses in this docket, please include page numbers and line numbers where the information sought by the staff can be found. Your cooperation is greatly appreciated.

RWM-1.01 TDS Metrocom Issue 33: Please provide Ameritech's definition of "Adjacent Location".

RWM-1.02 TDS Metrocom Issue 33: Please provide Ameritech's definition of "Off-site Adjacent Location".

OFFICIAL FILE

ILL. C. C. DOCKET NO. 01-0338

Staff Group Exhibit No. 4

Witness _____

Date 6-22-01 Reporter CB

- RWM-1.03** **TDS Metrocom Issue 33:** Please explain in detail the *technical* differences between “adjacent off-site collocation” and an interconnection arrangement where the CLEC is not collocated on Ameritech Illinois’ premise.
- RWM-1.04** **TDS Metrocom Issue 33:** Please explain in detail the *pricing* differences between “adjacent off-site collocation” and an interconnection arrangement where the CLEC is not collocated on Ameritech Illinois’ premise.
- RWM-1.05** **TDS Metrocom Issue 33: Please indicate and list any locations where** a CLEC has its equipment located at a place other than the premises of Ameritech Illinois.
- RWM-1.06** **TDS Metrocom Issue 35:** Please provide the reason(s) why Ameritech requires TDS Metrocom to use a 600 pair copper cable rather than a fiber optic cable.
- RWM-1.07** Please provide the name, job title, address, and telephone number of the person responsible for the content of this response.

Provide copies of Ameritech’s Responses to:

Russell Murray
Telecommunications Division
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, Illinois 62701
Rmurray@icc.state.il.us

Margaret Kelly
Mary J. Stephenson
160 North LaSalle Street
Suite C800
Chicago, Illinois 60601
(312) 793-2877

ILLINOIS COMMERCE COMMISSION

Staff Ex 4(1)

DATA REQUEST

REQUEST NUMBER RWM-2.01 through RWM-2.13

Requested of Company Representative: Mr. Peter Healy & Mr. Cliff Lawson

Utility Company: TDS Metrocom, Inc.

Date Submitted: May 29, 2001 Reference No.: 01-0338

Please provide the following documents and requested information on or before June 5, 2001, according to the following directions:

- A. Furnish all the information requested for each item in this data request. If that is not possible, please indicate what information is not being provided and the reason that it cannot be provided.
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RWM-2.01 TDS Metrocom Issue 33: Please provide TDS Metrocom's definition of "Adjacent Location".

RWM-2.02 TDS Metrocom Issue 33: Please provide TDS Metrocom's definition of "Off-site Adjacent Location".

- RWM-2.03** **TDS Metrocom Issue 33:** Please explain, in detail, the *technical* differences between “adjacent off-site collocation” and an interconnection arrangement where the CLEC is not collocated on Ameritech Illinois’ premise.
- RWM-2.04** **TDS Metrocom Issue 33:** Please explain, in detail, the *pricing* differences between “adjacent off-site collocation” and an interconnection arrangement where the CLEC is not collocated on Ameritech Illinois’ premise.
- RWM-2.05** **TDS Metrocom Issue 33:** Please indicate with specificity the type of equipment that TDS intends to use in an “Off-site Adjacent Location” arrangement.
- RWM-2.06** **TDS Metrocom Issue 158:** Please verify whether TDS Metrocom intends to provide SS7 signaling as well as trunking over the joint SONET facilities. If yes, how will these be provided?
- RWM-2.07** **TDS Metrocom Issue 158:** Please provide the technical reason(s), if any, that would prevent TDS Metrocom from putting the SS7 links on the joint SONET.
- RWM-2.08** **TDS Metrocom Issue 158:** Please indicate whether the referred joint SONET is a true SONET ring.
- RWM-2.09** **TDS Metrocom Issue 158:** If TDS Metrocom were to put the SS7 links on the joint SONET and if it is a true SONET ring, would you agree that it could provide some sort of diversity for these links? If yes, please explain why.
- RWM-2.10** **TDS Metrocom Issue 158:** Please indicate the current capacity of the joint SONET.
- RWM-2.11** **TDS Metrocom Issue 158:** Please indicate how much space is available on the joint SONET.
- RWM-2.12** **TDS Metrocom Issue 158:** Please list the parties associated with the joint SONET.
- RWM-2.13** Please provide the name, job title, address, and telephone number of the person responsible for the content of this response.

Provide copies of TDS Metrocom’s Responses to:

Russell Murray
Telecommunications Division
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, Illinois 62701
Rmurray@icc.state.il.us

Margaret Kelly
Mary J. Stephenson
160 North LaSalle Street
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Chicago, Illinois 60601
(312) 793-2877

4.0(c)

ILLINOIS COMMERCE COMMISSION

DATA REQUEST

REQUEST NUMBER RWM-3.01 through RWM-3.07

Requested of Company Representative: Ms. Nancy Hertel & Mr. Craig Mindell

Utility Company: Ameritech

Date Submitted: May 29, 2001 Reference No.: 01-0338

Please provide the following documents and requested information on or before June 5, 2001, according to the following directions:

A. Furnish all the information requested for each item in this data request. If that is not possible, please indicate what information is not being provided and the reason that it cannot be provided.

B. The response to each data request item should begin on a new page. As part of your response, please identify the item to which you are responding by typing it at the top of the page. In addition, provide the name, job title and phone number of the person responsible for providing the information requested for each item.

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D. Please provide individual responses as they become available. If you make reference to written testimony filed by your company's witnesses in this docket, please include page numbers and line numbers where the information sought by the staff can be found. Your cooperation is greatly appreciated.

RWM-3.01 TDS Metrocom Issue 158: Please provide the technical reason(s), if any, that would prevent TDS Metrocom from putting the SS7 links on the joint SONET.

RWM-3.02 TDS Metrocom Issue 158: Please verify whether the referred joint SONET is a true SONET ring.

RWM-3.03 TDS Metrocom Issue 158: If TDS Metrocom were to put the SS7 links on the joint SONET and if it is a true SONET ring, would you agree that it

could provide some sort of diversity for these links? If yes, please explain why you would agree that it would provide some sort of diversity for these links.

RWM-3.04 TDS Metrocom Issue 158: Please explain the current capacity of the joint SONET.

RWM-3.05 TDS Metrocom Issue 158: Please show how much space is available on the joint SONET.

RWM-3.06 TDS Metrocom Issue 158: Please list the parties associated with the joint SONET.

RWM-3.07 Please indicate the Ameritech representative(s) answering this data request.

Please provide copies of Ameritech's responses to:

Russell Murray
Telecommunications Division
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, Illinois 62701
Rmurray@icc.state.il.us

Margaret Kelly
Mary J. Stephenson
160 N. LaSalle
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4.0(d)

ILLINOIS COMMERCE COMMISSION

DATA REQUEST

REQUEST NUMBERS RWM 4.1

Requested of Company Representative: Mr. Peter Healy & Mr. Cliff Lawson

Utility Company: TDS Metrocom, Inc.

Date Submitted: 06/06/01 Reference No.: 01-0338

Please provide the requested information on or before (month day, year) according to the following directions:

Please provide the following documents and requested information on or before June 11, 2001, according to the following directions:

- A. Furnish all the information requested for each item in this data request. If that is not possible, please indicate what information is not being provided and the reason that it cannot be provided.
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- D. Please provide individual responses as they become available. If you make reference to written testimony filed by your company's witnesses in this docket, please include page numbers and line numbers where the information sought by the staff can be found. Your cooperation is greatly appreciated.

RWM 4-1: TDS Metrocom Issue 33: Staff would like to have a clarification on this collocation issue. Therefore, to aid in our understanding, consider the following hypothetical situation: A CLEC locates its switching equipment in a building adjacent to (or down the street from) an Ameritech central office. The CLEC wants to place facilities (cable) between the offices, and, depending on

the type of cable that the CLEC wants to place between the offices, there may be some terminating equipment in both offices. If Ameritech Illinois has exhausted its space in the central office where a CLEC wants to collocate its equipment what are the options available to the CLEC for collocations? Is this example similar to the situation that is being arbitrated in this case?

Provide copies of TDS Metrocom's Responses to:

Russell Murray
Telecommunications Division
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, Illinois 62701
Rmurray@icc.state.il.us

Margaret Kelly
Mary J. Stephenson
160 North LaSalle Street
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Chicago, Illinois 60601
(312) 793-2877

ILLINOIS COMMERCE COMMISSION

DATA REQUEST

REQUEST NUMBERS RWM 5

Requested of Company Representative: Ms. Nancy Hertel/MS. Theresa M. Bates

Utility Company: Ameritech

Date Submitted: 06/06/01 Reference No.: 01-0338.

Please provide the requested information on or before (month day, year) according to the following directions:

Please provide the following documents and requested information on or before June 5, 2001, according to the following directions:

- A. Furnish all the information requested for each item in this data request. If that is not possible, please indicate what information is not being provided and the reason that it cannot be provided.
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- D. Please provide individual responses as they become available. If you make reference to written testimony filed by your company's witnesses in this docket, please include page numbers and line numbers where the information sought by the staff can be found. Your cooperation is greatly appreciated.

RWM 5-1: TDS Metrocom Issue: 33 Staff would like to have a clarification on some of this collocation issue. CLEC is going to locate their switching equipment in a building adjacent to or down the street from the Ameritech central office and wants to place facilities (cable) between the offices. Depending on the type of

cable that the CLEC wants to place between the offices there may be some terminating equipment in both offices. Ameritech Illinois has exhausted its space in the central office where a CLEC wants to collocate its equipment.

What are the options available to the CLEC for collocations?

Is this example similar to what is being arbitrated in this case?

4.0(e)

ILLINOIS COMMERCE COMMISSION

DATA REQUEST

REQUEST NUMBERS RWM 5

Requested of Company Representative: Ms. Nancy Hertel/MS. Theresa M. Bates

Utility Company: Ameritech

Date Submitted: 06/06/01 Reference No.: 01-0338.

Please provide the requested information on or before (month day, year) according to the following directions:

Please provide the following documents and requested information on or before June 5, 2001, according to the following directions:

- A. Furnish all the information requested for each item in this data request. If that is not possible, please indicate what information is not being provided and the reason that it cannot be provided.
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- D. Please provide individual responses as they become available. If you make reference to written testimony filed by your company's witnesses in this docket, please include page numbers and line numbers where the information sought by the staff can be found. Your cooperation is greatly appreciated.

RWM 5-1: TDS Metrocom Issue: 33 Staff would like to have a clarification on some of this collocation issue. CLEC is going to locate their switching equipment in a building adjacent to or down the street from the Ameritech central office and wants to place facilities (cable) between the offices. Depending on the type of

cable that the CLEC wants to place between the offices there may be some terminating equipment in both offices. Ameritech Illinois has exhausted its space in the central office where a CLEC wants to collocate its equipment. What are the options available to the CLEC for collocations? Is this example similar to what is being arbitrated in this case?

4.0(4)

ILLINOIS COMMERCE COMMISSION

DATA REQUEST

REQUEST NUMBERS RWM 6.1

Requested of Company Representative: Ms. Nancy Hertel/Ms. Theresa M. Bates

Utility Company: Ameritech

Date Submitted: 06/12/01 Reference No.: 01-0338.

Please provide the requested information on or before (month day, year) according to the following directions:

Please provide the following documents and requested information on or before **June 14, 2001**, according to the following directions:

- A. Furnish all the information requested for each item in this data request. If that is not possible, please indicate what information is not being provided and the reason that it cannot be provided.
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RWM 6-1: TDS Metrocom Issue: 196 Please provide a copy of the Ameritech Acceptance Testing Method of Procedures.

Provide copies of Ameritech's Responses to:

Russell Murray
Telecommunications Division
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, Illinois 62701
Rmurray@icc.state.il.us

Margaret Kelly
Mary J. Stephenson
160 North LaSalle Street
Suite C800
Chicago, Illinois 60601
(312) 793-2877

4.0(f)

ILLINOIS COMMERCE COMMISSION

DATA REQUEST

REQUEST NUMBER TC-1.01 through TC-1.06

Requested of Company Representative: Ms. Nancy Hertel/ Ms. Theresa M. Bates

Utility Company: Ameritech Illinois

Date Submitted: May 29, 2001 Reference No.: 01-0338

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TC-1.01 **TDS Metrocom Issue 91:** Please provide a reasonable estimate of how many central offices in MSA 1 currently have collocation areas where power is not provided.

TC-1.02 **TDS Metrocom Issue 91:** Please explain what is the purpose for the areas described in TC-1.01

- TC-1.03** **TDS Metrocom Issue 91:** Please describe in detail the various steps needed to provide power in a collocation area.
- TC-1.04** **TDS Metrocom Issue 91:** Please provide the estimated time needed to complete each step as described in response to TC-1.03.
- TC-1.05** **TDS Metrocom Issue 91:** Does Ameritech view the lack of appropriate power sources in a collocation space as a subset of situations where collocation space is not "readily available", or does it view the provision of power as an entirely different situation?
- TC-1.06** Please provide the name, job title, and telephone number of the person responsible for the content of the responses above.

Provide copies of Ameritech's Responses to:

Torsten Clausen
Telecommunications Division
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, Illinois 62701
Tclausen@icc.state.il.us

Margaret Kelly
Mary J. Stephenson
160 North LaSalle Street
Suite C800
Chicago, Illinois 60601
(312) 793-2877

4-0Ch1

ILLINOIS COMMERCE COMMISSION

DATA REQUEST

REQUEST NUMBER TC-2.01 2.02

Requested of Company Representative: Mr. Cliff Lawson

Utility Company: TDS Metrocom, Inc.

Date Submitted: May 29, 2001 Reference No.: 01-0338

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TC-2.01 **TDS Metrocom Issue 30:** Please provide an example, other than collocation, where TDS Metrocom would combine a purchased UNE with one of Ameritech Illinois' tariffed service offering.

TC-2.02 Please provide the name, job title, and telephone number of the person responsible for the content of the responses above.

Provide copies of TDS Metrocom's Responses to:

Torsten Clausen
Telecommunications Division
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, Illinois 62701
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